

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE**

In re: TERSA YVONNE JONES
Debtor / Plaintiff

vs.
WELLS FARGO BANK, N.A.
Creditor / Defendant

Case No. 16-25734 GWE
Chapter 13
Adv. Pro. No.

COMPLAINT FOR INJUNCTIVE RELIEF

Comes now the Debtor/Plaintiff, by and through attorney of record, and in support of this Complaint for Injunctive Relief states:

1. That jurisdiction and venue are proper.
2. That the Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on June 23, 2016.
3. That the Debtor included Wells Fargo Bank, N.A. (hereinafter sometimes referred to as "Defendant") in her original petition as a secured creditor, holding a deed of trust on her real property located at 277 Red Oak Street, Memphis, Tennessee 38112.
4. That the real property is scheduled for a foreclosure sale on Thursday, July 14, 2016 at 10:00 A.M.
5. That the Debtor filed a Motion to Impose Automatic Stay on June 23, 2016 but the Motion is not set to be heard until July 14, 2016 at 10:00 A.M.
6. That it would be an injustice and the Debtor would suffer irreparable harm and injury if an order is not issued preventing Defendant from selling, transferring, or foreclosing on the aforementioned real property until a final hearing is held on the Debtor's Motion to Impose Automatic Stay. That the potential harm suffered by Defendant in being at least temporarily enjoined from selling, transferring or foreclosing on the aforementioned real property is minute compared to the potential harm that the Debtor would suffer if the relief she is seeking in this Complaint is not granted.
8. That the Debtor requests that the Defendant be enjoined from selling, transferring or foreclosing on her real property located at 277 Red Oak Street Memphis, Tennessee 38112.

WHEREFORE, PREMISES CONSIDERED, the Debtor prays that this matter be set for a hearing and that the Court enter an order for an injunction prohibiting the foreclosure, sale, or transfer of the subject real property.

Respectfully Submitted,

/s/ Herbert Hurst

Herbert Hurst (18721)

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